Exhibit A

Doran, Michelle L.

From:	Lisa Fleming [LFleming@bromsun.com]
Sent:	Thursday, March 30, 2006 7:01 PM
To:	Prof. Dr. Hermann Ney
Cc:	Lee Carl Bromberg; Erik Belt; Brad Lawrence; Columbia, Sarah; McKenna, Christopher J.

Subject: Nuance v. VST

Dear Professor Ney:

As we discussed during your visit last Friday, ScanSoft's designated counsel Brad Lawrence is reviewing VST's source code in order to provide you with specific locations you should review for evidence of VST's use and implementation of ScanSoft's trade secret techniques.

As you predicted, the source code is voluminous and Mr. Lawrence's review is time-intensive. In addition, the source code provided by VST appears to have numerous releases of products without identifying information about the various releases.

In order to meet our deadline of 7 April to provide you with source code locations, we hope you agree that we would be greatly assisted if VST could provide answers to the following questions regarding the VST source code:

1. There appear to be several releases of the source code and within each release, there are hundreds of "main" functions in the source code. Please provide a table that briefly describes each release of the code and the functions of each of the programs.
2. For each of the supplied VST releases please indicate whether the acoustic or word models it employs store any statistics on the expected or modeled duration of phonetic elements or states, including any model elements whose calculated values are in fact dependent on the observed durations of segments in the speech corpora from which such models are constructed. Please provide the C++ structure or class element names, database field names, or similar identifying information for all such information. Please indicate the name of each C++ structure or class element in which such information resides during recognition.
3. For each of the supplied VST releases please specify the C++ function, routine, or class method within which the top-level recognition (decoding) of a single spoken utterance is specified.
4. For each of the supplied VST releases please indicate whether it employs Viterbi decoding. If it does, please provide the name of the top-level C++ function, routine, or class method that implements the Viterbi decoding algorithm.

We believe that answers to these questions will facilitate Mr. Lawrence's review of the VST source code and that ultimately you may need answers to these questions to analyze the portions of the code to which we direct you. We therefore request that you submit these questions to VST's counsel with a request for prompt responses directed to Mr. Lawrence so that we can meet our 7 April deadline to you.

Of course, we are available to discuss this matter with you by telephone if you would like.
Best regards.

Lisa M. Fleming
Partner

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Bromberg & Sunstein LLP
Attorneys at Law
125 Summer Street
Boston, MA 02110-1618
Tel: (617) 443-9292
Fax: (617) 443-0004

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<<Lisa Fleming.vcf>>